

March 5, 2010

Cynthia Bryant, Chair  
Strategic Growth Council  
Governor's Office of Planning and Research  
State Capitol Building, Room 100  
Sacramento, CA 95814

RE: Sustainable Communities Planning Grant and Incentives Program

Dear Madame Chair and Members of the Council:

Thank you for the opportunity to comment on the draft final guidelines for the Sustainable Communities Planning Grant and Incentives Program. On behalf of our 130,000 members in California, The Nature Conservancy commends the Strategic Growth Council for identifying natural resource protection as a threshold requirement in the draft eligibility criteria for these funds. We urge the Council to ensure that proposals emphasizing the preservation of our natural lands and working landscapes receive the highest priority as these grants are awarded, according to voter intent in the passage of Proposition 84 and the language of SB 732.

We would like to make the following specific comments regarding the draft final guidelines:

1. *Add Regional Greenprints and NCCP Planning Activities as Explicit Examples of Eligible Proposals*

- “Regional greenprint” defined as: a plan that identifies strategically planned and managed networks of natural lands, working landscapes (such as farmland, ranchland and working forests), recreational and other open spaces that conserve ecosystem values and functions, provide associated benefits to human populations and is integrated into community and regional growth strategies. Regional greenprints would certainly meet the grant guidelines’ threshold requirements and a majority of the program objectives. However, many regional planning activities are focused on growth in the urban and suburban core and the natural resource component of growth plans is far from adequate. Making explicit regional greenprints as an eligible activity will encourage counties and regions to engage in this important activity that is critical to developing sustainable communities and reducing greenhouse gas emissions.
- Natural Community Conservation Plan planning activities. NCCP’s provide both the protection of natural resources and a streamlined permitting process for development and infrastructure projects. It is the only true tool available that accommodates development and protects wildlife habitat and ecosystems, and can provide the basis for sustainable communities. NCCP’s are highly collaborative: they are prepared under state law by local jurisdictions and special districts, in partnership with stakeholders and state and federal wildlife agencies. Some 15 regions are currently developing NCCP’s but funding is very scarce. Funding to help regions complete NCCP’s and encourage new NCCP’s would help immensely.

2. Make scoring more robust through additional indicators or evaluation questions.

The following are examples of additional indicators for “protect natural resources and agricultural lands” that can also be used as evaluation questions (Appendices J and K).

Metrics for habitat (greenfields) and agricultural lands

- Acres protected from conversion under permanent legal agreement (purchase for conservation/open space)
- Acres protected from conversion under short-term legal or voluntary agreement (Wetlands Reserve Program ten or 30 yr easement, Williamson Act)
- Acres adjacent to existing protected lands permanently conserved
- Acres avoided in the wildland urban interface (WUI)
- Acres of prime and farmland of statewide significance avoided

3. Provide additional guidance for the program objective of protecting natural resources and farmland.

As regions, counties, cities, MPO’s, RTPA’s and other entities engage in natural resource planning, they may seek guidance that would be helpful in identifying areas that represent critical natural resources and ecosystem services on which communities depend, such as watersheds, forestland, agricultural land and open space. Furthermore, once areas are identified, strategies can be adopted to help protect or manage those areas for their associated values. Mitigation dollars, for example, can be directed to protect or preserve priority conservation areas that the regions have identified through natural resource and conservation planning efforts. The critical element is to have a natural resource planning effort that is integrated with growth strategies so as to result in truly sustainable communities.

The following are examples of priority conservation areas that can be identified through a collaborative greenprint planning project that can be provided as guidance in the grant guidelines.

- Areas with occupied or suitable habitat for endemic, rare, or imperiled plant and animal species and communities.
- Areas identified in existing plans or analyses that provide connectivity between natural habitats, especially in areas with high rates of land use conversion, including riparian areas, and areas that have low levels of fragmentation from human land uses and infrastructure.
- Natural areas adjacent to existing public or privately protected areas that serve to buffer and improve habitat values within the protected area.
- Areas that serve to buffer developed and agricultural areas from natural disturbances, such as floodplains or natural fire breaks.
- Existing farm and ranchland.
- Natural areas important for the protection of climate benefits, such as habitat with high carbon storage in biomass (e.g., oak woodlands, conifer forests).
- Areas essential for maintaining or improving the integrity of watersheds, and for maintaining or improving the water quality and availability in surface water bodies and groundwater tables.

In addition, the following are links to online resources where applicants can find information on natural resource planning and integrating conservation into infrastructure development.

- <http://roadeology.ucdavis.edu/> UC Davis Road Ecology Center- clearinghouse for research on designing road systems which integrate with natural systems and minimize deleterious effects
- <http://www.greeninfrastructure.net/resources> Resources for integrating land use planning and conservation from The Conservation Fund
- <http://conserveonline.org/workspaces/cbdgateway/> Conservation by Design helps conservation practitioners determine what to conserve, opportunities to conserve it, what strategies to use and how effective they have been. The Conservation by Design Gateway provides guidance, tools, resources and case studies that support the approach and methods within Conservation by Design.
- <http://www.smartgrowthamerica.org/gcindex.html> Book summarizing research on emissions from transportation related to growth, urban and regional planning and the link between land use patterns and GHG emissions

As the Strategic Growth Council considers how to distribute the remaining funds from the Proposition 84 planning grants and incentives fund, the SGC should ensure that projects that are funded by these dollars incorporate natural resources, open space, and agricultural lands and their related benefits. Thank you for your continued efforts towards developing sustainable communities in California.

Sincerely,

A handwritten signature in black ink, appearing to read "Elizabeth O'Donoghue". The signature is fluid and cursive, with a long horizontal stroke at the end.

Elizabeth O'Donoghue  
Director of Infrastructure and Land Use